

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:15-CR-28
	:	
vs.	:	
	:	Judge Walter H. Rice
RONALD SKELTON II,	:	
	:	
Defendant.	:	<u>MOTION TO MODIFY BOND</u>

Defendant, Ronald Skelton (“Mr. Skelton”), through counsel, respectfully moves this Court to modify his bond conditions imposed on March 15, 2015 by removing the condition that he participate in a location restriction program. Currently, Mr. Skelton participates in the Curfew aspect of that program, a condition which the Court imposed on December 12, 2017, pursuant to his previous bond modification request.

As grounds for this Motion, Mr. Skelton states that throughout the pendency of this case, he has worked with his father’s company as a flooring apprentice. As such, both he and his father have performed contract work for various companies throughout the southern Ohio area. Lately however, the company has been receiving offers for out-of-state work, which they have had to forego, due to Mr. Skelton’s location restriction condition and the sometimes last minute notice of the required work days.

In addition, the family resides on a farm in Springfield, Ohio, which requires a lot of care. The Court, in placing Mr. Skelton on a curfew, has given him leave to work and help with related matters between 5:00 a.m. and 9:00 p.m. Monday- Saturday. However, the family recently began raising chickens, which require care seven days per week. Mr. Skelton, Sr. would like his son’s help in tending to the birds, however, his curfew only permits release on Monday- Friday.

Since his release on bond, Mr. Skelton has meticulously complied with every condition. However, in light of the job developments and added home responsibilities, compliance with the location restriction program has become increasingly difficult, often to the family's financial detriment. Mr. Skelton has discussed this matter with his Pretrial Services Officer, Patrick Kennedy, who does not object to this request. Further counsel has notified Assistant U.S. Attorneys, Andrew Hunt and Dominick Gerace, of Mr. Skelton's request.

Wherefore, Mr. Skelton requests that the Court remove the bond condition requiring that he participate in a location restriction program.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/Cheryll A. Bennett
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Ronald Skelton II

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Andrew Hunt and Dominick Gerace, Assistant United States Attorneys, on the date same was filed.

s/Cheryll A. Bennett
Cheryll A. Bennett